

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

*

VS.

*

CRIMINAL NO.: RDB-19-0144

KEVIN BROOKS

*

Defendant

*

MOTION TO SUPPRESS EVIDENCE SEIZED
OBTAINED FROM EXECUTION OF ARREST WARRANT

KEVIN BROOKS, by and through his attorney, David R. Solomon, Esquire, respectfully moves for this Honorable Court to suppress any and all tangible and derivative evidence seized as a result of the arrest warrant executed on March 07, 2019 and in support of this Motion, the Defendant states the following:

1. That the Defendant has been charged by indictment with one count of Conspiracy To Distribute And Possession With Intent To Distribute Heroin in violation of Title 21 U.S.C., § 846 and one count of Hobbs Act Conspiracy in violation of Title 18 U.S.C., § 1951(a).
2. The Defendant was originally arrested by law enforcement officers on March 07, 2019.
3. Discovery provided to the Defendant indicates that evidence, including statements by Mr. Brooks, were seized as a result of the arrest of Defendant on March 07, 2019. The Defendant believes that the Government may seek to introduce such evidence at trial.
4. Any such evidence was obtained in violation of the Defendant's right to be free from unreasonable search and seizure as guaranteed by the Fourth Amendment of the United States Constitution.

WHEREFORE, for the above reasons and for any other reasons which may appear to the court, the Defendant moves that all evidence obtained as a result of the March 07, 2019 execution of the invalid arrest warrant be suppressed.

Respectfully submitted,



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Attorney for Defendant,

KEVIN BROOKS

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 29th day of May, 2019, a copy of the foregoing was filed via CM/ECF to Peter J. Martinez, Esquire and Christina Hoffman, Esquire, Assistant United States Attorneys.



DAVID R. SOLOMON, ESQ.